

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IOAN GHILDUTA

Plaintiff,
-against-

04 CV 7494 (BSJ) (GWG)

THE TRUMP CORPORATION and MICHAEL P.
FISHMAN, as President of LOCAL 32B-32J,
SERVICE EMPLOYEES INTERNATIONAL
UNION, AFL-CIO

ECF Case

Defendants.

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**AFFIDAVIT OF KATCHEN LOCKE IN SUPPORT OF DEFENDANT LOCAL
32BJ'S MOTION FOR SUMMARY JUDGMENT**

Katchen Locke, an attorney duly admitted to practice law in the Courts of the State of New York, affirms the following under the penalties of perjury:

1. I am an associate general counsel in the Office of General Counsel, Service Employees International Union, Local 32BJ, attorneys for Defendant Michael P. Fishman, as President of Local 32B-32J, Service Employees International Union ("Local 32BJ" or "Union").
2. I am familiar with all of the pleadings and proceedings in this matter and I make this Affidavit in Support of the Local 32BJ's Motion for Summary Judgment.
3. Attached hereto are true and correct copies of the following documents: Exhibit A, relevant pages of the deposition of Plaintiff Ioan Ghilduta and exhibits R and X to the deposition; Exhibit B, Affidavit of Edward Foti; Exhibit C, Affidavit of Justin Cordello; Exhibit D, Affidavit of Paul Romero; and Exhibit E, relevant pages of the transcript of Judge Barbara S. Jones' order in *Saviano v. Local 32B-32J*, No. 96 CV 8136 (S.D.N.Y. 2002).

DATED: September 22, 2005
New York, New York

S/-
Katchen Locke (KL3724)